



Connecticut Environmental Council

Written Testimony  
Erica Fearn, Executive Director  
**Opposition to Raised Bill 46**  
**An Act Concerning Pesticides on Schools Grounds**  
Thursday, March 6, 2014  
Children Committee

Good afternoon Senator Bartolomeo, Representative Urban, Senator Linares, Representative Betts and the distinguished member of the Children Committee, my name is Erica Fearn, I am the Executive Director of the Connecticut Environmental Council (CTEC). I appreciate this opportunity to offer my comments in opposition to Raised Bill 46, An Act Concerning Pesticides on School Grounds.

CTEC is a membership organization representing associations and professionals. Our membership includes the Connecticut Groundskeepers Association, the Connecticut Tree Protective Association, the Connecticut Pest Control Association, the Connecticut Irrigation Contractors Association, and the Connecticut Association of Golf Course Superintendents.

During the 2005 session, CTEC supported legislation that permitted pest controls to be applied to public and private schools 8<sup>th</sup> grade or under if the applications adhered to an Integrated Pest Management (IPM) plan. In addition, the schools IPM plan must be consistent with DEEP's Model Pest Control Management Plan. From January 1, 2006 until the July 1, 2010 sunset, school grounds were well maintained using the best management practices of IPM.

In the way of background, state law defines IPM as "the judicious use of pesticides to maintain a pest population at or below an acceptable level, while decreasing the use of pesticides." As a result of IPM's judicious methods of applying lawn care pesticides, over the four years of the pilot program tons of active ingredients were withheld from use on school grounds. During the pilot, the IPM approach was proven to be safe, reliable and an effective way of applying lawn care pesticides, while protecting the financial investment towns have made in athletic fields and school grounds.

Since the July 1, 2010 sunset athletic fields and school grounds have fallen into disrepair with pest populations growing out of control making athletic fields unplayable due to hard and uneven playing surfaces and infestations of insects, both stinging and turf damaging. Healthy turf creates a cushion preventing injury to children playing on the surface. Attached to my testimony are two pictures of a middle school baseball field in West Haven. Under the IPM pilot program this athletic field was well maintained and provided a safe playing surface for many different teams during the year. The second picture was taken just 12 months after the ban. This field is unplayable and not safe for students to use. As a result, students from this school are now playing their games on a park and recreations field, which is not subject to the ban. Unfortunately this example is being repeated in many towns in the state.

The ban has left our members; the licensed, educated professionals that take care of school grounds without the proper tools to maintain healthy playing surfaces for our children. Instead we are left with untested and unregulated chemicals lacking sound science - a true disservice to our children and their safety.

In conclusion, any effort to expand the ban on pesticide use to the high school level will lead to more athletic fields and school grounds following into unsafe and unplayable conditions. CTEC recommends a balanced science based approach to ensure that students have safe and pest free school grounds and athletic fields. The current Kto8 ban simply has not worked and certainly should not be expanded to the high school level. We respectfully request that you not move forward with this proposal.

Thank you for this opportunity to provide you with this testimony.





Connecticut Environmental Council

Harry M. Bailey Middle School, West Haven, CT  
Before the Ban on Pesticides



After the Ban on Pesticides – July 2011



17 Rivendell Road, Marlborough, CT 06447  
CTEC@ctenvironmentalfacts.org

(203) 758-7297, (860) 228-1337 fax  
www.ctenvironmentalfacts.org





Connecticut Environmental Council

## Safe Management Practices for School Grounds

To ensure the safety of school children from hazards and the proper management of school grounds the following approach are utilized by knowledgeable experts. Credentialed experts who have the support of the leading professionals through the University system use the following steps:

- **Set Action Thresholds:** Decide at what point pest populations (insects, weed hazards) or conditions require action.
- **Record-Keeping,** which tracks pest identification and treatment.
- **Monitor and Identify Pests:** Identify pests and their risk accurately, in order to take appropriate action when thresholds are reached.
- **Evaluation,** identify the level of pests that require action.
- **Prevention:** Control pests before they become a problem through proper maintenance, sanitation and cultural practices.
- **Control:** When an action threshold is identified and preventative measures are no longer an option, effective pest control options are thoroughly evaluated. These include biological, mechanical and chemical options. The most effective control for the problem pest control are chosen with thoughtful evaluation of potential impact to the pest as well as children. If further monitoring, identifications and action thresholds indicate that controls are not working, then additional pest control methods would be evaluated and employed.

**Beyond Pesticides,** an organization that strives to remove the use of pesticides identifies six similar essentials for IPM programs:

- **Monitoring,** including regular site inspections and trapping.
- **Action Levels,** which identifies the level of infestation that requires action.
- **Prevention,** the primary means of pest control in an IPM program.
- **Tactics Criteria,** including the use of least-toxic materials that are applied to minimize any effect on humans or non-target organisms.
- **Evaluation,** conducted to determine the program's success.<sup>1</sup>

The **Northeast Organic Farming Association (NOFA)** outlines the same principles in its "Standards for Organic Land Care" (5<sup>th</sup> edition, January 2011). The Pest and Disease Management section states the following:

- "The best way to manage pests is to prevent the pests from reaching damaging levels."<sup>2</sup>
- "Pest control requires a pest management plan, which should include regular monitoring of plant health and pest density."<sup>3</sup>

<sup>1</sup> Alternatives to Using Pesticides in Schools." Beyond Pesticides. <http://www.beyondpesticides.org/schools/schoolipm/index.htm>. Accessed 29 Feb 2012.

<sup>2</sup> "Standards for Organic Land Care: Practices for the Design and Maintenance of Ecological Landscapes." NOFA Organic Land Care Program. Northeast Organic Farming Association. 5<sup>th</sup> Edition, January 2011. <http://www.organiclandcare.net/sites/default/files/upload/standards2011.pdf> Accessed 29 Feb 2012.

<sup>3</sup> Ibid, pg. 51.



- "Maximize the effectiveness of the material so that the amount and the number of applications can be kept at a minimum."<sup>4</sup>

The NOFA approach does allow for the use of pesticides after habitat modification and non-chemical methods have failed. They do not allow for synthetic pesticide use.

### **Integrated Pest Management (IPM) Defined**

According to the U.S. Environmental Protection Agency, Integrated Pest Management (IPM) is an "effective and environmentally sensitive approach to pest management that relies on a combination of common-sense practices." The EPA states, "IPM takes advantage of all appropriate pest management options including, but not limited to, the judicious use of pesticides."<sup>5</sup> The IPM approach used by organic farming follows the same principles. Here's a closer look at an IPM approach that includes pesticide use and one that does not. The basic approach is the same.

---

<sup>4</sup> Ibid, pg. 52.

<sup>5</sup> Integrated Pest Management Principles. U.S. Environmental Protection Agency.  
<http://www.epa.gov/pesticides/factsheets/ipm.htm>. Accessed 27 Feb 2012.

